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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLANTIC HEALTH SYSTEM, INC.,
AHS HOSPITAL CORP., and
ATLANTIC AMBULANCE CORP.,

Plaintiffs,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, a
member company of American
International Group and
AMERICAN INTERNATIONAL GROUP,
Individually,

Defendants.

Civil Action No. 08-1661 (GEB) (MCA)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

DOCUMENT ELECTRONICALLY FILED

TO: Bubb, Grogan & Cocca, LLP
25 Prospect Street
Morristown, New Jersey 07960
Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on a date to be scheduled by the Court and pursuant to the August 31, 2010 briefing schedule set by the Court [Docket Entry No. 63], which requires that all motion papers are to be submitted by December 20, 2010, counsel for defendants, National Union Fire Insurance Company of Pittsburgh, PA ("National Union") and American International Group, Inc., improperly pled as American International Group

("AIG"; collectively, "Defendants"), shall apply before the Honorable Garrett E. Brown, Chief Judge of the United States District Court, District of New Jersey, Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order granting summary judgment to Defendants.

PLEASE TAKE FURTHER NOTICE that in support of its motion Defendants shall rely upon the enclosed Brief, the Certification of Sean R. Kelly, Esq., the Affidavit of Martha S. Keane, the Affidavit of Angelo Manganiello, and all exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form or Order is submitted herewith.

SAIBER LLC

/s/ Sean R. Kelly
SEAN R. KELLY

Dated: October 15, 2010